

## Etobicoke Pickleball Association Confidentiality Policy

The purpose of this policy is to govern the collection, use and disclosure of personal information in the course of Association business in a manner that recognizes the right of privacy of individuals with respect to their personal information and the need of The Etobicoke Pickleball Association (EPA) to collect, use or disclose personal information. This policy applies to all EPA Directors, Volunteers and Employees. Compliance with the principles outlined in this policy shall be treated as essential for contract compliance with suppliers, consultants and other contracted organizations.

EPA will take all reasonable steps to respect and protect the privacy of personal information by complying with the 10 privacy principles described in the Personal Information Protection and Electronic Documents Act (PIPEDA) legislation. Details regarding each of the principles are described on the Government of Canada website: http://laws-lois.justice.gc.ca/eng/acts/P-8.6/index.html.

These 10 principles are: accountability; identifying purposes; consent; limiting collection; limiting use, disclosure and retention; accuracy; safeguards; openness; individual access; and challenging compliance.

## Procedures

1. EPA will protect confidential and personal information by:

Taking all reasonable steps to secure and protect the information, as follows:

- Electronic records of personal information will be subject to limited access by authorized personnel in the performance of their duties.
- Printed records of personal information, when they are not under the control of authorized personnel, will be kept in a secure location.
- Obtaining consent of members and registered participants or their legal guardian before providing their personal information to the City of Toronto (Etobicoke) and providing notice of collection and use of personal information by EPA and the City.

- Disclosing to individuals that personal information is being collected and directing them to the Confidentiality Policy.
- Destroying the information when it is no longer required. Personal information will be destroyed two years after it is no longer required.

## 2. Detailed guidelines:

Personal information may be collected without knowledge or consent only in the following circumstances:

- In the event of an emergency that threatens the life, health or security of an individual.
- If there are reasonable grounds to believe that the information could be useful to investigate the contravention of a law.
- The collection is in the interest of the individual and consent cannot be obtained in a timely way.
- The collection of the information with the individual's knowledge or consent would compromise the availability or accuracy of the information and the collection is required to investigate the contravention of a law.
- The information is publicly available.

Personal information may be disclosed without knowledge or consent only in the following circumstances:

- In the event of an emergency that threatens the life, health or security of an individual.
- To a lawyer representing EPA.
- To collect a debt owed to EPA by the individual.
- To a government institution that has indicated disclosure is required on a matter relating to national security or the conduct of international affairs.
- The information is publicly available.
- If required by law.
- For other circumstances listed in subsection 7(3) of PIPEDA.
- Requests from an individual to provide information about their personal information being collected, used or disclosed by EPA will be answered within 30 days. No fee will be charged for this service.
- If an individual withdraws consent for the use of personal information, the Board will take all necessary steps to cease EPA's use of the information within 30 days.

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